

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

CRAIG A. GENESS,)	CIVIL ACTION NO. 2:16-cv-00876
)	
Plaintiff,)	HONORABLE MARK A. KEARNEY
)	
v.)	
)	
COMMONWEALTH OF)	
PENNSYLVANIA, et al.,)	
)	
Defendants.)	

STATE OF FLORIDA	:
	: SS:
MARTIN COUNTY	:

AFFIDAVIT

Before me, the undersigned authority, a notary public in and of the Commonwealth of Pennsylvania and County aforesaid, personally appeared KAREN KIEFER, who, duly sworn and according to law, deposes and says that the following statements are true and correct to the best of her personal knowledge, information and belief:

1. I am Karen Kiefer, and I reside in Stuart, Florida.
2. At Fayette County Orphan's Court No. 14-OC-2017, a Decree was entered on July 6, 2017 by the Honorable Judge Leskinen, appointing me as Limited Guardian of the person and Estate of Craig A. Geness for the specific purpose of assisting in the prosecution of the federal lawsuit and making decisions with regard to all matters related thereto.
3. I participated in the mediation of this matter on August 30, 2019, by telephone.
4. During the mediation, I was involved in the negotiations between the Plaintiff and all parties, including the Department of Human Services (DHS).
5. Sometime thereafter, with the assistance of counsel, I made the decision to agree to a \$375,000 settlement with DHS.

6. I believe that the settlement with DHS is commensurate to their liability in this matter.
8. The money obtained from this settlement will be placed in a special needs trust to be used to finance any health issues that Plaintiff may experience, as well as for any of Plaintiff's daily living needs. Moreover, if feasible, the money may be used to place Mr. Geness in a more accommodating living facility.
9. I have reviewed the settlement agreement in this matter and believe that the terms and conditions are acceptable and reflective of the agreement between the parties.

FURTHER THE AFFIANT SAYETH NOT

Submitted by:


Karen Kiefer

Sworn to and subscribed
to before me this 18th
day of October, 2019.


Notary Public

My Commission Expires: January 16th, 2023

